

ESTTA Tracking number: **ESTTA525486**Filing date: **03/07/2013**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**Petition for Cancellation**

Notice is hereby given that the following party requests to cancel indicated registration.

**Petitioner Information**

Name	Glen J. Larson		
Entity	Individual	Citizenship	UNITED STATES
Address	4775 Centennial Blvd., Suite 150 Colorado Springs, CO 80919 UNITED STATES		

Correspondence information	Sofia Jeong Legal Representative Troutman Sanders LLP 600 Peachtree St. NE, Suite 5200 Atlanta, GA 30308 UNITED STATES trademarks@troutmansanders.com, sofia.jeong@troutmansanders.com Phone:4048853678
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**Registration Subject to Cancellation**

Registration No	3891632	Registration date	12/21/2010
Registrant	Mogul Entertainment, Inc. 14652 Mansfield St., Apt. #1 Detroit, MI 48227 UNITED STATES		

**Goods/Services Subject to Cancellation**

Class 009. First Use: 2003/10/02 First Use In Commerce: 2003/10/02

All goods and services in the class are cancelled, namely: Musical sound recordings and audio-visual recordings featuring pre-recorded music recorded on compact discs, tape cassettes, vinyl records, digital downloads, CD-ROMs, VHS videotapes, DVDs and laser discs; movies, namely, motion picture films about music; video games, namely, video game software, video game cartridges, video game tape cassettes, video game discs, video game machines for use with televisions, interactive video game programs; downloadable video game software; downloadable videos and sound recordings featuring music

**Grounds for Cancellation**

Abandonment	Trademark Act section 14
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Attachments	MOGUL ENTERTAINMNET - Petition for cancellation.pdf ( 4 pages )(52677 bytes )
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**Certificate of Service**

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by First Class Mail on this date.

Signature	/sj/
Name	Sofia Jeong
Date	03/07/2013

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Glen J. Larson.	)	
	)	
	)	
Petitioner,	)	Mark: MOGUL ENTERTAINMENT
	)	
v.	)	Registration No.: 3891632
	)	Cancellation No.: _____
Mogul Entertainment, Inc.	)	
	)	
Registrant.	)	
	)	
	)	

**PETITION FOR CANCELLATION**

Petitioner, Glen J. Larson ("Petitioner") for its Petition of Cancellation against Registration No. 3891632 owned by Mogul Entertainment, Inc. ("Registrant") shows the Board as follows:

1.

Petitioner is a U.S. citizen having the address of 4775 Centennial Blvd., Suite 150, Colorado Springs, Colorado, United States 80919.

2.

Registrant is a Michigan corporation located at 14652 Mansfield St., Apt #1, Detroit, Michigan 48227.

3.

Registrant has filed for and received federal registration for the mark "MOGUL ENTERTAINMENT," Registration No. 3891632, in International Class 9 for "Musical sound

recordings and audio-visual recordings featuring pre-recorded music recorded on compact discs, tape cassettes, vinyl records, digital downloads, CD-ROMs, VHS videotapes, DVDs and laser discs; movies, namely, motion picture films about music; video games, namely, video game software, video game cartridges, video game tape cassettes, video game discs, video game machines for use with televisions, interactive video game programs; downloadable video game software; downloadable videos and sound recordings featuring music.”

4.

Upon information and belief, Registration No. 3891632 for the mark “MOGUL ENTERTAINMENT” is not in use in commerce in the U.S. by the Registrant for the goods set forth in the subject registration and such mark has become abandoned.

5.

Accordingly, Registration No. 3891632 for the mark “MOGUL ENTERTAINMENT” should be canceled in whole pursuant to 15 U.S.C. § 1064(3).

6.

If Registration No. 3891632 is still in use for some, but not all goods set forth in the subject registration, “MOGUL ENTERTAINMENT” should be canceled in part pursuant to 15 U.S.C. § 1064(3).

7.

Petitioner currently has an application for Serial No. 85/440681 for the mark “MOGUL.” Based on such application, Petitioner will be damaged by the existence of Registration No. 3891632 on the Principal Register. Petitioner has standing to bring the instant action pursuant to 15 U.S.C. § 1063(a).


Petitioner has paid the fee for the petition cancellation in the amount of \$300.00. If any additional fees are deemed to be payable, please charge our Deposit Account No. 20-1507.

WHEREFORE, Petitioner prays that said Registration No. 3891632 be canceled and that this Cancellation action be sustained in favor of Petitioner.

This 7th day of March, 2013

Respectfully submitted,

TROUTMAN SANDERS LLP

By:   
Sofia Jeong, Esq.  
Georgia Bar No. 629253  
F. Richard Rimer, Esq.  
Georgia Bar No. 140819

ATTORNEYS FOR GLEN J. LARSON

TROUTMAN SANDERS LLP  
600 Peachtree Street, N.E., Suite 5200  
Atlanta, Georgia 30308-2216  
Tel: (404) 885-3000

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE  
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Glen J. Larson.	)	
	)	
Petitioner,	)	Mark: MOGUL ENTERTAINMENT
	)	
v.	)	Registration No.: 3891632
	)	Cancellation No.: _____
Mogul Entertainment, Inc.	)	
	)	
Registrant.	)	
	)	
	)	

**CERTIFICATE OF SERVICE**

I have this date served the foregoing PETITION FOR CANCELLATION by forwarding a copy by first class mail to the Registrant and by electronic mail as follows:

Stephanie L. Hammonds, Esq.  
719 Griswold St.  
Suite 820  
Detroit, MI 48226-3311

Email: slynn629@aol.com

This 7th day of March, 2013.

  
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Sofia Jeong